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Attorneys for Defendants Technip Italy S.p.A. and Technip S.A.

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

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HOVENSA L.L.C.	:	
	:	
Plaintiff,	:	
	:	
-against-	:	08 CIV. 1221 (NRB)
	:	
	:	<u>NOTICE OF MOTION</u>
	:	
TECHNIP ITALY S.P.A. and TECHNIP S.A.,	:	
	:	
Defendants.	:	
-----	:	
	x	

PLEASE TAKE NOTICE THAT, upon Defendants' Notice of Motion, the accompanying Memorandum of Law in support thereof dated June 4, 2008, the Declaration of Etienne Gory dated June 3, 2008, the Declaration of Patrick Picard dated June 4, 2008, the Declaration of Christopher Paparella dated June 4, 2008, and the prior pleadings and proceedings held herein, Defendants Technip Italy S.p.A. and Technip S.A., by their undersigned attorneys, will move this Court, before the Honorable Naomi R. Buchwald, at the United States Courthouse, 500 Pearl Street, New York, New York 10007, for an order pursuant to Rule 12(b)(2), 12(b)(6), and 12(b)(7) of the Federal Rules of Civil Procedure dismissing Plaintiff's

First Amended Complaint in its entirety, and such other and additional relief as the Court deems just and proper.

Dated: New York, New York
June 4, 2008

HUGHES HUBBARD & REED LLP

By: 

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To: Gabriel Del Virginia
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Attorneys for Plaintiff Hovensa L.L.C.

CERTIFICATE OF SERVICE

I, Beatriz Biscardi, am over the age of eighteen (18) years, not a party to this action, caused a true and correct copy of the foregoing Notice of Motion, dated June 4, 2008, Defendant's Memorandum of Law in Support of Their Motion to Dismiss the First Amended Complaint, dated June 4, 2008, Declaration of Patrick Picard, dated June 4, 2008, Declaration of Etienne Gory, dated June 3, 2008, and Declaration of Christopher Paparella, dated June 4, 2008, to be served on this 4th day of June, 2008, to the following:

VIA ELECTRONIC FILING & FEDEX
Gabriel Del Virginia
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New York, NY 10022

VIA E-MAIL
George T. Shipley
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Houston, TX 77002

ATTORNEYS FOR PLAINTIFF HOVENSA

I declare under penalty of perjury that the foregoing is true and correct.

Dated: June 4, 2008
New York, New York

/s/ Beatriz Biscardi
Beatriz Biscardi